8.0 Other CEQA/NEPA Issues

This section contains additional environmental analyses and discussions required by California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA).

8.1 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines states that significant irreversible environmental changes, which would be caused by a proposed project need to be discussed. This evaluation is also required by NEPA (40 CFR 1502.16). These changes may include the following:

- Uses of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use thereafter unlikely;
- Primary impacts and, particularly, secondary impacts which commit future generations to similar uses; and
- Irreversible damage, which may result from environmental accidents, associated with the project.

Table 8.1 presents a summary of potential irreversible and irretrievable commitments of resources associated with the proposed project. The proposed Nacimiento Water Project (NWP) would require an increase in consumption of non-renewable resources during construction and operation (i.e., fossil fuels, and natural gas through consumption of electricity produced at natural gas fuelled power stations). However, the demand for these non-renewable resources by the proposed project is relatively small. The project does not open access to any new non-renewable resources, and does not consume unusually large quantities of the existing resources, thus the use of the non-renewable resources although irreversible, is considered to be *insignificant*.

The proposed NWP would commit the open land to a different use: the open land where the WTP and other water system facilities are planned to be constructed would be irreversibly committed to a different use. This change in land use although is irreversible, is considered to be *insignificant* since the converted land area would be comparatively small, and no additional public access roads would be constructed.

The proposed project is not expected to result in irreversible damage from environmental accidents, although it could cause environmental accidents (e.g., releases of water treatment chemicals) that have the potential to create impacts to biological resources. Potential impacts can be reduced, however, through use of adequate design and operating procedures and effective emergency response plans specifying staffing and equipment needs. The potential for environmental accidents to occur is relatively minor and the impacts associated with the treatment chemicals releases during the WTP operation are possible, but are unlikely to result in irreversible damage.

Table 8.1 Summary of Potentially Irreversible and Irretrievable Commitments of Resources

Resource	Impact Summary
Hydrology and Water Quality	Insignificant impact on water quality due to the diversion of water from the Salinas River drainage. Potential increases in seawater intrusion in the lower Salinas River valley mitigated through MCWRA reservoir reoperation.
Geology and Soils	No irreversible or irretrievable impacts.
Drainage, Erosion & Sedimentation	No irreversible or irretrievable impacts.
Air Quality	No irreversible or irretrievable impacts.
Noise	No irreversible or irretrievable impacts.
Hazards and Hazardous Materials	No irreversible or irretrievable impacts.
Biological Resources	Significant impacts to biological resources can be mitigated to a level of insignificance, therefore no irreversible or irretrievable impacts.
Cultural Resources	Ground-disturbing activities required for pipeline and facility could result in the irreversible/ irretrievable disturbance to important cultural, Native American, and paleontological resources. However, impacts considered less than significant.
Land Use	No direct irreversible or irretrievable impacts on land use, but potential impacts could occur due to growth (see below).
Public Services and Utilities	No irreversible or irretrievable impacts.
Transportation/Circulation	No direct irreversible or irretrievable impacts on Transportation/Circulation, but potential impacts could occur due to growth (see below).
Aesthetics/Visual Resources	The construction of project infrastructure would result in permanent and irreversible changes to the visual nature of the area. However, impacts considered less than significant.
Agricultural Resources	No irreversible or irretrievable impacts.
Recreational Resources	No irreversible or irretrievable impacts.
Socioeconomics	No irreversible or irretrievable impacts.
Growth	*Significant* impact due to the removal of water as an impediment to growth. However, increased water supplies associated with the project would only accommodate a portion of the growth identified in the County General Plan.

It was identified in Section 5.1, Hydrology and Water Quality, that an effective reduction of up to 8,100 afy from the 106,500 afy conservation releases at Lake Nacimiento (8% reduction) would be potentially significant, but would be mitigated by MCWRA's planned reservoir reoperation to mitigate seawater intrusion in the coastal portion of the Salinas Basin. Therefore, potential impacts associated with the project would be considered less than significant.

The purposed NWP is to deliver up to 16,200 afy of Lake Nacimiento water to various purveyors in the SLO County. Thus, the project by definition involves use of the locally limited natural resource (i.e., fresh water), and is an irreversible change. However, this change, if considered by itself, is not significant, because Lake Nacimiento water would be used in the short-term instead of the currently used groundwater. Discussed below are other irreversible changes that follow

from the project and cumulatively make the changes in water use a *significant irreversible change*.

The proposed NWP has the potential to commit future generations to similar uses due to primary and secondary impacts associated with the additional water availability in the area. These potential impacts could permanently alter the use of the areas where the water would be available by removing growth impediment (i.e., water). Irreversible secondary impact due to removal of impediment to growth would be to schools, traffic and air (i.e., increase in population and overcrowding of existing schools, addition of vehicles and increased emissions from the vehicles and house heaters/burners, respectively) due to elimination of impediment to growth (see Section 7.0). Therefore, because the project would stimulate growth and commit future generations in the SLO County to the use of Lake Nacimiento water, this is considered a *significant irreversible change* caused by the project.

8.2 Short-Term Use Of The Environment *vs.* Maintenance Of Long-Term Productivity

Section 15126(e) of the CEQA Guidelines states that the project's local short-term uses of the environment in relation to any adverse effects on the maintenance or enhancement of long-term productivity shall be evaluated. This evaluation is also required by NEPA (40 CFR 1502.16). Special attention is to be given to impacts which narrow the range of beneficial uses of the environment or pose long-term risks to health and safety. In addition, the reasons why the proposed project is believed by the Applicant to be justified now, rather than reserving an option for future alternatives, should be explained.

As it was determined throughout Section 5, the project poses no long-term significant risks to health and safety that can not be mitigated (Sections Hazards and Hazardous Materials, Transportation/Circulation and Air Quality).

The project has a potential to narrow the recreational use of Lake Nacimiento (recreational boating and visual enjoyment of people that use Nacimiento Recreational area) during drought season due to a low water level. However this impact is not considered to be significant, since the water level would be significantly affected only during rare drought seasons that historically affect the reservoir water approximately every 40 years (see Section 5.1, Hydrology and Water Quality).

The proposed NWP would provide an alternative water source to SLO County, and therefore the project would in the short-term decrease reliance on the groundwater resources in the area. However, in the long-term, as the population of the County grows (see Section 7.0, Growth Inducement) an increase in groundwater use would naturally follow. Also, in the long-term, the NWP would result in reduction of water releases to Salinas River. Therefore, the beneficial short-term decrease in groundwater use in the SLO County basins would result in a long-term loss of 16,200 afy of Lake Nacimiento water, which in turn would increase potential for salt water intrusions into the groundwater basins in the Monterey County, and could potentially affect water quality and aquatic biota in the Salinas River during drought years. However, MCWRA's planned reservoir reoperation would mitigate seawater intrusion associated with the NWP.

Table 8.2 Summary of Short-term and Long-term Impacts

Resource	Impact Summary
Hydrology and Water Quality	Less than significant impacts to water quality during pipeline and facility construction. Less than significant long-term impact to water quality due to the diversion of water from the Salinas River drainage and potential increases in seawater intrusion in the lower Salinas Valley which are offset by MCWRA reservoir reoperation.
Geology and Soils	No significant short- or long-term impacts expected.
Drainage, Erosion & Sedimentation	Potential short-term impacts during pipeline construction, but less than significant. No significant long term impacts expected.
Air Quality	Significant short-term impacts associated with construction emissions. Long-term impacts considered adverse, but less than significant.
Noise	No significant short- or long-term impacts expected.
Hazards and Hazardous Materials	No significant short- or long-term impacts expected.
Biological Resources	Significant impacts to biological resources can be mitigated to a level of insignificance, therefore no significant short- or long-term impacts are expected.
Cultural Resources	Ground-disturbing activities required for pipeline and facility could result in the long-term disturbance to important cultural, Native American, and paleontological resources. However, impacts considered less than significant.
Land Use	No significant short- or long-term impacts expected. Growth could result in potential future changes in land use and planning.
Public Services and Utilities	No significant short- or long-term impacts expected.
Transportation/Circulation	No significant short- or long-term impacts expected. Future impacts could occur due to growth that will result in response to increased water supplies.
Aesthetics/Visual Resources	The construction of project infrastructure would result in permanent and irreversible changes to the visual nature of the area. However, no significant short- or long-term impacts expected.
Agricultural Resources	No significant short- or long-term impacts expected.
Recreational Resources	No significant short- or long-term impacts expected.
Socioeconomics	No significant short- or long-term impacts expected.
Growth	*Significant* long-term impact due to the removal of water as an impediment to growth. However, increased water supplies associated with the project would only accommodate a portion of the growth identified in the County General Plan.